



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Mark R. Johnson, Treasurer  
Maersk Good Government Fund Maersk Inc.  
Political Action Committee  
P.O. Box 880  
Madison, NJ 07940

AUG 1 2001

Identification Number: C00217471

Reference: October Quarterly Report (7/1/00-9/30/00)

Dear Mr. Johnson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report discloses aggregate year-to-date totals for contributions received from individuals which appear to be incorrect. Please be advised that federal regulations require aggregate year-to-date totals to include only those contributions which are received during the calendar year. In the event that the aggregate year-to-date total is correct, please note that federal regulations also require the disclosure of all contributions received from individuals who have contributed over \$200. 11 CFR §104.3(a)(4) Please amend your report to provide the correct aggregate year-to-date totals.

-Please amend Schedule B supporting Line 23 by providing the office sought (i.e., House, Senate, or President) including the state and congressional district for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted per pay period. 11 CFR

§104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Scott Walker  
Reports Analyst  
Reports Analysis Division

## PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS		The amount deducted for each category of the Detailed Summary Page		PAGE OF
<b>Contributions from Individuals</b> Any information except from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				FOR LINE NUMBER 11(a)(2)
<b>NAME OR COMMITTEE OR PAC</b> National Organization PAC 000000001				
<p>A. Full Name, Mailing Address and ZIP Code Anne Sullivan 21 18th Street City, State ZIP</p> <p>Employer: <input type="checkbox"/> Other Employer: <input type="checkbox"/> Party <input type="checkbox"/> General</p>		<p>Name of Employer National Organization, Inc.</p> <p>Occupation Branch Manager</p> <p>Aggregate Year-to-Date &gt; \$ 225.00</p>	<p>Date Itemized Aug. 1994</p> <p>Payroll deduction</p>	<p>Amount of Cash Reported This Period \$80.00 (\$15 biweekly)</p>
<p>B. Full Name, Mailing Address and ZIP Code Rodney Jones 581 Hainsbury Road City, State ZIP</p> <p>Employer: <input type="checkbox"/> Other Employer: <input type="checkbox"/> Party <input type="checkbox"/> General</p>		<p>Name of Employer National Organization, Inc.</p> <p>Occupation Vice President</p> <p>Aggregate Year-to-Date &gt; \$ 350.00</p>	<p>Date Itemized Aug. 1994</p> <p>Payroll deduction</p>	<p>Amount of Cash Reported This Period \$130.00 (\$60 biweekly)</p>

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

## Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$80 for six pay periods) as "unitemized contributions" on Line 11(a)(1) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

## IN-KIND CONTRIBUTIONS

SCHEDULE A ITEMIZED RECEIPTS		The amount deducted for each category of the Detailed Summary Page		PAGE OF
<b>Contributions from Individuals</b> Any information except from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				FOR LINE NUMBER 11(a)(2)
<b>NAME OR COMMITTEE OR PAC</b> National Organization PAC 000000001				
<p>A. Full Name, Mailing Address and ZIP Code Martin L. Krebs 4 River Road City, State ZIP</p> <p>Employer: <input type="checkbox"/> Other Employer: <input type="checkbox"/> Party <input type="checkbox"/> General</p>		<p>Name of Employer National Organization, Inc.</p> <p>Occupation Chairman</p> <p>Aggregate Year-to-Date &gt; \$ 3,990.00</p>	<p>Date Itemized B/19/94</p>	<p>Amount of Cash Reported This Period \$3,990.00 (\$1K/CD) (\$400/CD) (\$100/CD)</p>

SCHEDULE B ITEMIZED DISBURSEMENTS		The amount deducted for each category of the Detailed Summary Page		PAGE OF
<b>Operating Expenditures/Other Federal</b> Any information stated from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				FOR LINE NUMBER 21(b)
<b>NAME OR COMMITTEE OR PAC</b> National Organization PAC 000000001				
<p>A. Full Name, Mailing Address and ZIP Code Martin L. Krebs 4 River Road City, State ZIP</p>		<p>Payroll Disbursement Party's price</p> <p>Employment Info: <input type="checkbox"/> Party <input type="checkbox"/> General <input type="checkbox"/> Other Receipts</p>	<p>Date Itemized B/19/94</p>	<p>Amount of Cash Disbursement This Period \$3,990.00 (\$1K/CD CONTRIBUTION)</p>

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

## In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at left.

